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Counsel for Plaintiffs, Opt-in Plaintiffs and Putative Class

[Additional Counsel of Record listed on the Signature page]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al., individually and
on behalf of others similarly situated,
Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,
Defendant.

Case No. 3:18-cv-01477-JR

**PARTIES' JOINT STIPULATION AND
[PROPOSED] ORDER REQUESTING
AN EXTENSION TO FILE A STATUS
REPORT AND PROPOSED CASE
MANAGEMENT SCHEDULE**

Plaintiffs Kelly Cahill, *et al.* (“Plaintiffs”) and Nike, Inc. (“Nike” or “Defendant”) (collectively, the “Parties”), through their respective counsel hereby present the following stipulated and agreed upon request for a short extension to file a Status Report and Proposed Case Management Schedule.

The Parties Have a Good Faith Basis for Revising the Default Deadlines

On April 4, 2023, this Court issued an Order requiring, if Plaintiffs’ Rule 23(f) Petition was denied, the Parties to “confer and file a formal Joint Status Report which includes proposed case management deadlines within 14 days of the Ninth Circuit Court’s ruling.” ECF No. 338. On June 1, 2023, the Ninth Circuit, in its discretion, denied the petition. The current deadline for the Parties is thus June 15, 2023.

Since the petition was denied, the Parties have been conferring but have not completed the process. The Parties believe they can complete the conferral process by June 29, 2023. In the absence of any other impacted litigation deadlines, the Parties stipulate to and respectfully request that the Court enter an order revising the due date for the Status Report to June 29, 2023.

STIPULATED REVISED DEADLINES

The Parties hereby stipulate and agree and request the Court order that the Parties complete their conferral and file a Status Report with proposed case management deadlines by June 29, 2023.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: June 14, 2023

Respectfully submitted,

GOLDSTEIN, BORGES, DARDARIAN & HO

/s/Craig Ackermann

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Attorneys for Plaintiffs and Opt-In Plaintiffs

Dated: June 14, 2023

Respectfully submitted,

/s/Daniel Prince

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Attorneys for Nike, Inc.

SIGNATURE ATTESTATION

In accordance with Civil Local Rule 11(b)(2), I attest that concurrence in the filing of this document has been obtained from the signatories on this e-filed document.

Dated: June 14, 2023

Respectfully submitted,

ACKERMANN & TILAJEF, P.C.

/s/Craig Ackermann

Craig Ackermann (admitted *pro hac vice*)

[PROPOSED] ORDER

The Court has reviewed the Parties' Joint Stipulation Requesting An Extension To File A Status Report And Proposed Case Management Schedule and hereby enters the same. The Parties shall confer and file a formal Joint Status Report which includes proposed case management deadlines by June 29, 2023.

IT IS SO ORDERED.

Dated:

JOLIE A. RUSSO
United States Magistrate Judge